

Graham & James LLP



July 3, 1996

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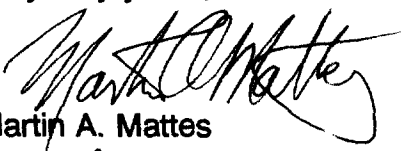
**DOCKET FILE COPY ORIGINAL**

**Re: Errata to Comments of California Payphone Association  
in CC Docket 96-128**

Dear Sir or Madam:

Enclosed please find an original and 14 copies of the Errata to the Comments of California Payphone Association on Notice of Proposed Rulemaking filed on July 1 in the above-captioned proceeding. An extra copy of the errata is enclosed for returning a file-stamped copy to our office in the envelope provided.

Very truly yours,

  
Martin A. Mattes  
of  
GRAHAM & JAMES LLP

MAM:jw

Enclosures

cc via Federal Express:

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Our File: 16063.5

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**BEFORE THE  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20554**

**RECEIVED  
JUL 08 1996  
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In the Matter of

Implementation of the  
Pay Telephone Reclassification  
and Compensation Provisions of the  
Telecommunications Act of 1996

CC Docket No. 96-128

**ERRATA TO  
COMMENTS OF CALIFORNIA PAYPHONE ASSOCIATION  
ON NOTICE OF PROPOSED RULEMAKING**

In the Comments of California Payphone Association, filed July 1, 1996 in the above-captioned proceeding, the title page and page 1 included an incorrect title. The title should be corrected to read "Comments of California Payphone Association on Notice of Proposed Rulemaking" rather than "Comments of California Public Utilities Commission on Notice of Proposed Rulemaking." The attached pages should be inserted to replace the title page and page 1 of each of the previously enclosed 14 copies of the July 1 filing.

Counsel for California Payphone Association regrets this error.

Respectfully submitted,

GRAHAM & JAMES

By

  
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Attorneys for CALIFORNIA  
PAYPHONE ASSOCIATION

July 3, 1996

**BEFORE THE  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20554**

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In the Matter of )

Implementation of the )  
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CC Docket No. 96-128

**COMMENTS OF CALIFORNIA PAYPHONE ASSOCIATION  
ON NOTICE OF PROPOSED RULEMAKING**

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**Attorneys for CALIFORNIA  
PAYPHONE ASSOCIATION**

July 1, 1996

**BEFORE THE  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20554**

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In the Matter of	)	
	)	
Implementation of the	)	CC Docket No. 96-128
Pay Telephone Reclassification	)	
and Compensation Provisions of the	)	
Telecommunications Act of 1996	)	
_____	)	

**COMMENTS OF CALIFORNIA PAYPHONE ASSOCIATION  
ON NOTICE OF PROPOSED RULEMAKING**

In accordance with the Commission's General Rules of Practice and Procedure, 47 CFR Section 1.1, et seq., and the specific procedures set forth in the Commission's Notice of Proposed Rulemaking ("NPRM"), released June 6, 1996, in the above-captioned proceeding, California Payphone Association ("CPA") respectfully submits its comments in response to issues presented by the NPRM.

**I.**

**DESCRIPTION OF CALIFORNIA PAYPHONE ASSOCIATION  
AND ITS PARTICIPATION IN THIS PROCEEDING**

CPA is a regular participant, as the principal representative of independent payphone providers ("IPPs"), in telecommunications regulatory proceedings before the California Public Utilities Commission ("CPUC"), performing before the CPUC a role comparable to that typically assumed by the American Public Communications Council ("APCC") in matters before the FCC. CPA is generally familiar with and fully supports the positions being advanced by APCC in the present